UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

MICHAEL ERNANO,

Plaintiff,

-against-

GARY MELIUS, et al,

Defendant.

NOTICE OF MOTION TO ADMIT COUNSEL FOR PRO HAC VICE

Civil Action No. 14 Civ. 1516 (JS) (ARL)

TO: Joshua A. Marcus

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PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate of Good Standing annexed thereto we will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of movant, a member of the firm Connolly Wells & Gray, LLP, and a member in good standing of the Bar of the Commonwealth of Pennsylvania, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for Plaintiff Michael Ernano. There are no pending disciplinary proceedings against me in any State or Federal court.

Respectfully submitted,

/s/ Gerald D. Wells, IIII
Gerald D. Wells, IIII
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Dated: September 2, 2015